



DEREK SMITH
LAW GROUP, PLLC
Employment Lawyers Representing Employees Exclusively

November 16, 2021

Via ECF

Hon. Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Figueroa v. ZZ LASHES INC. et al.*
Case No: 1:20-cv-04382

Dear Judge McMahon:

11/16/2021
60 day order
Submit Settlement or JOINT
agreement or
pretrial order by
January 14, 2022
✓

This firm represents Plaintiff in the above case. Plaintiff respectfully requests a stay of this action pending final execution of the settlement and dismissal with prejudice, or alternatively, leave to file a non-joint Proposed Pretrial Order. The parties have recently agreed to a settlement, and a final settlement agreement with terms that all parties have agreed to has been sent to Defendant Oberoi for his execution. We anticipate having the fully executed settlement agreement shortly and stipulating to dismiss with action with prejudice within the next few months. Moreover, we sent Defendant Oberoi a draft of the attached Proposed Joint Pre-Trial Order for his edits over forty (40) days ago, and we have been attempting to receive Defendant Oberoi's edits regarding the attached Proposed Joint Pretrial Order since that time, repeatedly following up with him. We have not received his edits to date.

In light of the above, Plaintiff respectfully requests a stay of this action pending final execution of the settlement and dismissal with prejudice, or alternatively, leave to file the non-joint Proposed Pretrial Order as attached.

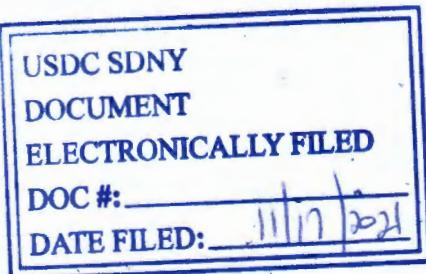
I thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Ishan Dave

MEMO ENDORSED

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CC: All Counsel of Record (Via ECF)

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